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The Honorable James L. Robart  
United States District Judge

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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A.A., Antonio MACHIC YAC, and W.H.,  
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Individually and on Behalf of All Others  
Similarly Situated,

Plaintiffs,

v.

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UNITED STATES CITIZENSHIP AND  
IMMIGRATION SERVICES; UNITED  
STATES DEPARTMENT OF HOMELAND  
SECURITY; James MCCAMENT, Acting  
Director, U.S. Citizenship and Immigration  
Services; Elaine DUKE, Acting Secretary,  
U.S. Department of Homeland Security,

Defendants.

Case No. 2:15-cv-00813-JLR

STIPULATION AND ~~PROPOSED~~ ORDER  
REQUESTING EXTENSION OF TIME TO  
FILE COMBINED JOINT STATUS REPORT  
AND DISCOVERY PLAN and EXCHANGE  
INITIAL DISCLOSURES

NOTE ON MOTION CALENDAR:  
August 29, 2017

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Pursuant to this Court's Order of August 3, 2017, ECF No. 98, the parties must exchange  
initial disclosures by August 31, 2017, and file a Combined Joint Status Report and Discovery  
Plan by September 7, 2017. As ordered, the parties held a Rule 26(f) conference on August 11,  
2017. However, due to ongoing settlement discussions, other negotiations between the parties  
regarding discovery, and previously scheduled leave and travel obligations, the parties request an  
approximately three-week extension to exchange their initial disclosures and file the Combined  
Joint Status Report and Discovery Plan.

Accordingly, the parties to the above-referenced action, by and through their undersigned  
counsel of record, hereby respectfully STIPULATE, AGREE, and JOINTLY REQUEST that the

1 Court extend the deadlines for initial disclosures and the Combined Joint Status Report and  
2 Discovery Plan by approximately three weeks. The parties request that initial disclosures be due  
3 on or before September 20, 2017, and that the Combined Joint Status Report and Discovery Plan  
4 be due on or before September 28, 2017.

5

6 DATED: August 29, 2017

Respectfully submitted,

7 CHAD A. READLER  
8 Acting Assistant Attorney General

*s/Melissa Crow*  
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13 *s/Adrienne Zack*  
14 ADRIENNE ZACK  
15 Trial Attorney  
16 U.S. Department of Justice  
17 Civil Division  
18 Office of Immigration Litigation  
19 District Court Section  
20 P.O. Box 868, Ben Franklin Station  
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25 Attorneys for Defendants

26 Attorneys for Plaintiffs

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Stipulation and ~~Proposed~~ Order  
Case No. 2:15-cv-00813-JLR

U.S. Department of Justice, Civil Division  
Office of Immigration Litigation  
P.O. Box 868, Ben Franklin Station  
Washington, D.C. 20044  
(202) 598-2446

1                   **CERTIFICATE OF SERVICE**  
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I HEREBY CERTIFY that on August 29, 2017, I electronically filed the foregoing  
Stipulation Requesting Extension of Time to File Combined Joint Status Report and Discovery  
Plan and Exchange Initial Disclosures with the Clerk of the Court using CM/ECF. I also certify  
that the foregoing document should automatically be served this day on all counsel of record via  
transmission of Notices of Electronic Filing generated by CM/ECF.

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9                   s/ Adrienne Zack \_\_\_\_\_  
10                  ADRIENNE ZACK  
11                  Trial Attorney  
12                  U.S. Department of Justice  
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The Honorable James L. Robart  
United States District Judge

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

A.A., et al.,

Case No. 2:15-cv-00813-JLR

Plaintiffs,

[PROPOSED] ORDER EXTENDING TIME  
TO FILE COMBINED JOINT STATUS  
REPORT AND DISCOVERY PLAN and  
EXCHANGE INITIAL DISCLOSURES

v.

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UNITED STATES CITIZENSHIP AND  
IMMIGRATION SERVICES, et al.,

NOTE ON MOTION CALENDAR:  
August 29, 2017

Defendants.

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[Proposed] ORDER

The parties having so stipulated and agreed, it is hereby SO ORDERED.

The parties shall exchange initial disclosures on or before September 20, 2017, and the Combined Joint Status Report and Discovery Plan shall be due on or before September 28, 2017. The Clerk is directed to send copies of this Order to all counsel of record.

Dated this 30, day of August, 2017.

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Stipulation and ~~Proposed~~ Order  
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